

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

In re: John Elbert Williams, Jr.	}	Case No. 09-16327NLJ
and	}	
Stephanie Ann Williams,	}	
Debtors.	}	Chapter 13

MOTION TO MODIFY PLAN

Debtors John Elbert Williams, Jr. and Stephanie Ann Williams, (herein referred to as "Debtors"), respectfully move the Court to modify their Plan as follows:

- 1 - Treat payments as current through October, 2012.
2. Increase payments to \$1,375.60 monthly beginning October, 2012 through remainder of the *Plan*.

In Support Whereof, Debtors allege:

1. Debtors filed for relief under Chapter 13 of the Bankruptcy Code on November 5, 2012 and Plan was confirmed on March 31, 2010, providing for payment of \$1,160 for six months and \$1,265 monthly for period of 54 months.
2. Due to temporary business slow-downs, Debtors' earnings dropped and payments gradually accrued a delinquency of \$3,165.
3. Debtor's earnings have increased and Debtors continue to make payments required under the *Plan* and for the past two months increased payments by \$200 monthly.
4. By inadvertent oversight, Debtors' counsel failed to file motion to modify

when intended in mid-September, 2012 and therefore this motion is made without request of customary attorney's fee. Debtors have on this date expressed willingness for inclusion of such fee but it is not included to off-set the inconvenience incurred by Debtors and Trustee's office.

5. It appears the proofs of claim timely filed herein before the deadline are materially less numerically than the amounts scheduled for payment in originally proposed *Plan*.
6. Debtors request that their Plan payments be presumed to be current through October, 2012.

/s/ James Branum

James Branum, Attorney for Debtors,
oba11622, Box 1296, Newcastle, OK 73065
405/387-9888 fax: 405/387-9888,
james@branumlaw.com

Certificate of Service

Pursuant to Local Rule 9007(d), I certify that this instrument is served on October 24, 2012 via USPS with 1st Class Postage thereupon fully prepaid, addressed to all parties identified on following Exhibit A.

/s/ James Branum

James Branum, oba11622, Attorney for Debtors
Box 1296, Newcastle, OK 73065 405/387-9888
888/927-2686 fax: 405/387-3799

Label Matrix for local noticing
1087-5
Case 09-16327
Western District of Oklahoma
Oklahoma City
Wed Oct 24 22:11:33 CDT 2012

CAMELOT FINANCIAL SERVICES, INC. DBA CHARTER
CAMELOT FINANCIAL SERVICES, INC.
P. O. BOX 30399
MIDWEST CITY, OK 73140-3399

Oklahoma Tax Commission
Legal Division
120 N Robinson Suite 2000W
Oklahoma City, OK 73102-7801

U.S. Trustee
United States Trustee
215 Dean A. McGee Ave., 4th Floor
Oklahoma City, OK 73102-3444

American General Financial Services, Inc.
8816 S. Penn, Suite 500
Oklahoma City, OK 73159-5242

C E Wadsack
415 W Gray
Norman OK 73069-7186

Cmre Financial Svcs In
3075 E Imperial Hwy Ste
Brea CA 92821-6753

Gemb/Jcp
Po Box 981402
El Paso TX 79998-1402

Jefferson Capital Systems LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

Portfolio Recvry&Affil
120 Corporate Blvd Ste 1
Norfolk VA 23502-4962

(p)SPRINGLEAF FINANCIAL SERVICES
P O BOX 3251
EVANSVILLE IN 47731-3251

East Bay Funding, LLC
c/o Resurgent Capital Services
PO Box 288
GREENVILLE, SC 29602-0288

Quantum3 Group LLC as agent for
Galaxy Portfolios LLC
PO Box 788
Kirkland, WA 98083-0788

USBC Western District of Oklahoma
215 Dean A. McGee
Oklahoma City, OK 73102-3426

Asset Acceptance Llc
Po Box 2036
Warren MI 48090-2036

CAMELOT FINANCIAL SERVICES, INC.
DBA CHARTER LOAN SERVICE
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MIDWEST CITY, OK 73140-3399

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8014 Bayberry Rd
Jacksonville FL 32256-7412

Hsbc Bank
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Carol Stream IL 60197-5253

LVNV Funding LLC
Resurgent Capital Services
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Greenville, SC 29603-0587

Progressive Mgmt Syste
1521 W Cameron Ave Fl 1
West Covina CA 91790-2738

B-Line, LLC
MS 550
PO Box 91121
Seattle, WA 98111-9221

Internal Revenue Service
55 N Robinson Stop 5024
Oklahoma City, OK 73102-9229

Roundup Funding, LLC
MS 550
PO Box 91121
Seattle, WA 98111-9221

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Po Box 35430
Colorado Springs CO 80935-3543

Auto Finance
208 W I-240 Service Rd
Oklahoma City OK 73139-8001

Cac Financial Corp
2601 Nw Expwy
Oklahoma City OK 73112-7236

Galaxy Portfolios LLC
c/o B-Line LLC
MS 550
PO Box 91121
Seattle WA 98111-9221

Internal Revenue Service
55 North Robinson
Oklahoma City OK 73102-9229

PRA Receivables Management, LLC
As Agent Of Portfolio Recovery Assocs.
POB 41067
NORFOLK VA 23541-1067

Quantum3 Group LLC
Galaxy Portfolios LLC
PO Box 788
Kirkland, WA 98083-0788

Stuart Allan & Assoc
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C O WEINSTEIN AND RILEY, PS
2001 WESTERN AVENUE, STE 400
SEATTLE, WA 98121-3132

Tnb - Target
Po Box 673
Minneapolis MN 55440-0673

World Acceptance Corp
830 Nw 12th St
Moore OK 73160-1709

World Acceptance Corporation
2219 West I-240 Service Rd, Ste 108
Oklahoma City, OK 73159-8251

World Finance Corp
2219 W I240 Service Rd S
Oklahoma City OK 73159-8250

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John T. Hardaman
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Stephanie Ann Williams
809 Camelot Drive
Moore, OK 73160-1509

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

American General Financial Services, Inc.
7927 N. May Avenue
Oklahoma City, OK 73120 United States

(d) American General Finance
8816 S Pennsylvania Ave
Suite 400
Oklahoma City OK 73159

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) American General
1125 SW59th
Mail Returned-99999

(u) Auto Finance
1125 SW59th
Mail Returned-99999

(u) E.R. Soultion
Po Box 97029
Mail Returned-99999

(d) East Bay Funding, LLC
c/o Resurgent Capital Services
PO Box 288
Greenville, SC 29602-0288

(u) James Hanger
212 East Vidalway
Mail Returned-99999

(d) Oklahoma Tax Commission
Legal Division
120 N. Robinson, Suite 2000W
Oklahoma City, OK 73102-7801

(d) Roundup Funding, LLC
MS 550
PO Box 91122
Seattle, WA 98111-9221

End of Label Matrix
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Bypassed recipients 7
Total 47